

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Case No. 5:20-cv-03664-LHK-SVK

Plaintiffs,

V.

GOOGLE LLC.

Defendant.

## **DECLARATION OF ANDRE GOLUEKE**

1. I am a Discovery Manager within the Legal Department at Google LLC. I make this declaration based on personal knowledge and information provided to me by Google colleagues, and, if called to testify, I could and would competently testify to such facts.

2. I understand that the Court has ordered Google to provide a declaration related to certain searches and productions Google has completed in this litigation. Dkt. 332. As part of my duties as a Discovery Manager in Google’s Legal Department, I have become aware of the work that Google personnel has performed to comply with Google’s discovery obligations in this litigation, and to comply with the Court’s discovery orders. To further confirm my understanding of Google’s efforts, I have obtained additional information from the Google engineers and other Google personnel working on identifying and searching relevant data sources for this litigation.

3. To the best of my knowledge and informed understanding, Google has provided a complete list of sources that contain information about Plaintiffs relevant to Plaintiffs' claims. The data sources are listed in Exhibit A.

4. To the best of my knowledge and informed understanding, Google either has or is in the process of producing all responsive and relevant data related to the Named Plaintiffs—or to pseudonymous identifiers Plaintiffs provided—from respective prior searches of those data sources. A summary of the data produced is listed in Exhibit B.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 18th day of November 2021 at Orinda, California.

By Andre Golueke  
Andre Golueke